

**IN THE UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DONNA CURLING, et al. }
Plaintiff, }
vs. }
BRAD RAFFENSPERGER, et al. }
Defendant. }

**CIVIL ACTION FILE
NO.: 1:17-cv-2989-AT**

DECLARATION OF BRUCE P. BROWN

Bruce P. Brown hereby declares under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I have personal knowledge of all facts stated in this declaration, and if called to testify, I could and would testify competently thereto.
2. I represent the Coalition Plaintiffs in this case.
3. Attached as Exhibit 1 is a screenshot of a photograph that accompanied an Atlanta Journal Constitution article by Mark Niesse dated January 10, 2023.
4. Attached as Exhibit 2 is a true and correct copy of a December 4, 2022 memo from the Election Division to county election officials. Coalition Plaintiffs received this document in response to an Open Records Act request.

5. The following is a link to a February 4, 2023 Associate Press article on the growing concern over the security of electronic pollpads.

<https://apnews.com/article/arizona-united-states-government-2022-midterm-elections-donald-trump-los-angeles-651d0e923973daf28ff3b9d6105b4d74>.

This 10th day of February, 2023,



Bruce P. Brown